

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES)	
)	
V.)	No. 0102 1:18CR00091-1-LM
)	
)	
Shawn Poley)	

ASSENTED TO MOTION TO SEAL

Now Comes the defendant, through undersigned counsel, and requests that this Honorable Court seal Mr. Poley's Request for Trial Witness Representation and associated forms appearing in the file as docket 1 and 1-1 as well as all related orders sealed at level 2.

IN SUPPORT OF THIS Motion to Seal, it is stated as follows.

1. Undersigned counsel has been appointed to represent Mr. Poley as a trial witness.

Specifically, Mr. Poley is a cooperating witness who would be called by the United States Government. As such, the appointment of counsel to represent him as well as his status as trial witness could jeopardize Mr. Poley's safety and the safety of his family.
2. The United States by and through Assistant U.S. Attorney Nathans has been contacted and assents to the relief requested herein.

WHEREFORE, Mr. Poley requests this Honorable Court:

- A. Seal the Request for Appointment of Counsel as a Trial Witness, all related documents and orders currently appearing in the file including this Motion to Seal for one year; and,

B. Grant such other relief as justice and equity may require.

Respectfully Submitted,
Shawn Poley
By his Attorney,

Date: December 21, 2020

/s/ Jonathan Cohen
Jonathan Cohen
NH Bar # 14185
Cohen & Winters, PLLC
64 North State Street, Suite 1
Concord, NH 03301
(603) 224-6999

CERTIFICATE OF SERVICE

I Jonathan Cohen, herein certify that on this 18th day of December 2020, a copy of the within was electronically forwarded to Assistant United States Attorney Nathans, United States Attorney's Office, James C. Cleveland Federal Bldg., 55 Pleasant St., Room 352, Concord, NH 03301-3941 and Riaka R. McCormick, U.S. Probation Officer, Concord, New Hampshire.

/s/ Jonathan Cohen
Jonathan Cohen